

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
:
David Brown : Bankruptcy No. 17-16081-AMC
Plaintiff :
:
V. : Adversary No.
:
Veripro Solutions, Inc. :
:
Defendant :

COMPLAINT TO DETERMINE SECURED STATUS PURSUANT TO
U.S.C. 506

1. Debtor filed for relief under Title 11, Chapter 13 on September 7, 2017.

2. Debtor owns the real estate located at 1142 Foulkrod Street, Philadelphia, PA 19124.

3. Debtor avers that the home had a fair market value of \$168,021.00 based on values at the time of filing. See Exhibit "A".

4. Debtor has a first mortgage with U.S. Bank National Association, as trustee, c/o Select Portfolio Servicing, Inc. in the approximate amount of \$218,146.29. See Exhibit "B".

5. Debtor has a second mortgage with Veripro Solutions, Inc., in the approximate amount of \$43,282.67. See Exhibit "C".

6. Debtor's second mortgage with Veripro Solutions, Inc., is wholly unsecured pursuant to 11 U.S.C. 506.

WHEREFORE, Debtor respectfully requests that this Honorable Court enter an order determining the 2nd mortgage to be avoided and to be treated as a unsecured claim.

/s/ David M. Offen
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Dated: 5/29/18